

# **EXHIBIT A**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

THE LEADER’S INSTITUTE, LLC  
And DOUG STANEART

VS

ROBERT JACKSON and MAGNOVO  
TRAINING GROUP, LLC,

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Case No. 3:14-cv-03572-B

JURY TRIAL DEMANDED

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**DECLARATION OF GARY R. SORDEN**

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1. My name is Gary R. Sorden. I am over 18 years of age, of sound mind, capable of making this declaration, and personally acquainted with the facts stated herein. I have personal knowledge of the facts in this declaration, and they are true and correct.

2. I am an attorney licensed to practice law in the State of Texas. I represent Plaintiffs The Leader’s Institute, LLC and Doug Staneart (hereinafter “Plaintiffs”) in the above captioned civil action.

3. The attached Exhibit 1 is a true and correct copy of Plaintiffs’ Third Amended Complaint dated December 17, 2015.

4. The attached Exhibit 2 is a true and correct copy of Defendants’ Answer, Defenses, and Counterclaims to Plaintiffs’ Third Amended Complaint dated January 11, 2016.

5. The attached Exhibit 3 is a true and correct copy of Docket No. 54 – Court’s Memorandum Opinion and Order dated July 24, 2015.

6. The attached Exhibit 4 is a true and correct copy of Defendants' Second Supplemental Rule 26(a)(1)(A) Disclosures dated July 15, 2016.

7. The attached Exhibit 5 is a true and correct copy of Defendant Robert Jackson's Objections and Answers to Plaintiffs' First Set of Interrogatories dated November 25, 2015.

8. The attached Exhibit 6 is a true and correct copy of Defendant Robert Jackson's Responses to Plaintiffs' Second Set of Interrogatories dated July 20, 2016.

9. The attached Exhibit 7 is a true and correct copy of Defendant Magnovo Training Group, LLC's Responses to Plaintiffs' First Set of Interrogatories dated July 20, 2016.

10. The attached Exhibit 8 is a true and correct copy of a September 9, 2014 Cease and Desist Letter to Magnovo.

11. The attached Exhibit 9 is a true and correct copy of the UDRP Decision dated August 28, 2015.

12. The attached Exhibit 10 is a true and correct copy of a March 29, 2012 Email from D. Staneart to C. Johnston regarding Odyssey.

13. The attached Exhibit 11 is a true and correct copy of Cease and Desist letters sent to Odyssey Teams, Inc. and Best Corporate Events.

14. The attached Exhibit 12 is a true and correct copy of a April 3, 2015 Email from D. Staneart to C. Johnston regarding Voicemail.

15. The attached Exhibit 13 is a true and correct copy of a December 4, 2015 Email from W. Doss to G. Sorden regarding Responses to Interrogatories.

16. The attached Exhibit 14 is a true and correct copy of McCarthy's Section 20.52 (4<sup>th</sup> Edition).

17. The attached Exhibit 15 is a true and correct copy of the USPTO docket sheet showing that Plaintiffs abandoned the MAGNOVO mark.

18. The attached Exhibit 16 is a true and correct copy of transcript excerpts from the July 7, 2016 deposition of D. Staneart.

19. The attached Exhibit 17 is a true and correct copy of transcript excerpts from the July 18, 2016 Magnovo Rule 30(b)(6) deposition.

20. The attached Exhibit 18 is a true and correct copy of a May 20, 2014 Email from D. Staneart to R. Summeier regarding Magnovo and Rob Jackson.

Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 1, 2016.

/s/ Gary R. Sorden  
Gary R. Sorden